

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

AEGIS INSURANCE SERVICES, LTD.;  
 ALLIED WORLD ASSURANCE COMPANY,  
 LTD.; COMMONWEALTH INSURANCE  
 COMPANY; LEXINGTON INSURANCE  
 COMPANY OF LONDON; WELLINGTON  
 INSURANCE COMPANY; and ZURICH  
 INSURANCE COMPANY, as Subrogees of  
 SIERRA PACIFIC RESOURCES,

Plaintiffs,

v.

GENERAL ELECTRIC COMPANY, GAS  
 TURBINE DIVISION, and DOES 1-30  
 inclusive,

Defendants.

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NO. 3:06-cv-503-ECR-RAM

**JOINT AND UNOPPOSED MOTION TO STAY PROCEEDINGS**

Plaintiffs, Aegis Insurance Services, Ltd., Allied World Assurance Company, Ltd., Commonwealth Insurance Company, Lexington Insurance Company of London, Wellington Insurance Company, and Zurich Insurance Company, as Subrogees of Sierra Pacific Resources and Defendant, General Electric Company (identified in Plaintiffs' Complaint as "General Electric Company Gas Turbine Division"), request that the Court to stay these proceedings

pending settlement negotiations and mediations between the parties hereto. In support hereof, the parties would show as follows:

The parties have been and continue to be involved in negotiations regarding the resolution of the claims made in the above captioned litigation in addition other claims not pending in this litigation but similar to these litigation claims involving parties related to the parties in this litigation. The parties hereto have determined that the resolution of these litigation claims (and other claims involving related parties and similar issues) is best facilitated through the stay of this litigation and the scheduling of mediation session aimed at the resolution of all claims.

Currently, the parties have scheduled mediation sessions for 17 - 18 October 2007 in Atlanta, Georgia; and these sessions are expected to continue as the parties work to negotiate all disputes currently pending between them. The parties believe that these negotiations would be facilitated if the above captioned litigation were stayed and pending claims could be addressed without litigation activity and its consequent cost and expense.

Accordingly, the parties request the Court to enter an order staying these proceedings until such time that either of the parties hereto requests that the stay be lifted to allow for further process consistent with the results of the parties currently ongoing negotiations and scheduled mediation sessions.

Respectfully submitted,

Dated: 14 September 2007

**HAMILTON AND McMAHON, LTD.**

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Harvey Fruman  
(Admitted *pro hac vice*)  
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**DAIGLE FISSE & KESSENICH, PLC**

Michael D. Fisse

Dated: 14 September 2007

By: electronic approval / Harvey Fruman  
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IT IS ORDERED THAT THIS MATTER IS STAYED FOR 60 DAYS.

Robert A. McQuaid, Jr.

ROBERT A. MCQUAID, JR.  
UNITED STATES MAGISTRATE JUDGE

DATED: September 17, 2007

**CERTIFICATE OF SERVICE**

I do hereby certify that on this 14<sup>th</sup> day of September 2007, I have served a copy of the foregoing pleading on counsel for all parties to this proceeding, by mailing the same by United States mail, properly addressed, and first class postage prepaid.

Harvey Fruman  
Harvey Fruman